

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

NORDIC INTERACTIVE
TECHNOLOGIES LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No.: 6:20-cv-00064

JURY TRIAL DEMANDED

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE
TO AMEND INFRINGEMENT CONTENTIONS**

Nordic Interactive Technologies (“Nordic”) served Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) with its Initial Infringement Contentions on July 10, 2020, and Samsung contends leave of court is necessary to amend contentions to add an inadvertently forgotten claim chart that Samsung contends was not previously provided in Nordic’s Preliminary Infringement Contentions pursuant to the Court’s June 30, 2020 Order Governing Proceedings [Dkt. 21]. Nordic has met and conferred with Samsung and exchanged correspondence where Samsung has given consent to file this unopposed motion for leave to amend said Initial Infringement Contentions (*see* Exh. 1) including that Nordic agrees that (i) the asserted claims of US 7,590,097 have an invention date no later than October 31, 2002; and (ii) the asserted claims of US 6,345,095 have an invention date no later than August 14, 1998 (*Id.*). Nordic submits this corrected Motion based on further conversations with Samsung on August 31, 2020. Regardless of whether leave is required or not, Samsung has agreed that it has no objection to Nordic’s motion for leave given said stipulations and, out of an abundance of caution, Nordic requests leave to serve its first amended contentions,

which include documents related to claims Samsung contends were not previously provided in Nordic's Preliminary Infringement Contentions served July 10, 2020. Once the Court so orders and allows, Nordic will timely serve said Amended Initial Infringement Contentions.

Respectfully submitted,

PARKER, BUNT & AINSWORTH, P.C.

/s/ Robert Christopher Bunt

Robert Christopher Bunt
Texas State Bar No. 00787165
Charles Ainsworth
Texas State Bar No. 00783521
100 E. Ferguson, Suite 418
Tyler, Texas 75702
Tel. (903) 531-3535
charley@pbatyler.com
rcbunt@pbatyler.com

William Cory Spence
Jason Wejnert
SpencePC
515 N. State St., 14th Floor
Chicago, Illinois 60654
312-404-8882
william.spence@spencepc.com
jason.wejnert@spencepc.com

**Attorneys for Plaintiff Nordic Interactive
Technologies LLC**

CERTIFICATE OF SERVICE

I hereby certify that, on September 1, 2020, a true and correct copy of the foregoing was served to all counsel of record via CM/ECF.

/s/ Robert Christopher Bunt

ROBERT CHRISTOPHER BUNT